

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MOTIVATION INNOVATIONS, LLC,

Plaintiff,

V.

EXPRESS, INC., ULTA SALON,
COSMETICS & FRAGRANCE, INC.,
PETSMART, INC. and VICTORIA'S
SECRET STORES LLC d/b/a VICTORIA'S
SECRET,

Defendants.

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendants Express, Inc., Ulta Salon, Cosmetics & Fragrance, Inc., Petsmart, Inc. and Victoria's Secret Stores LLC hereby move to dismiss plaintiff Motivation Innovations, LLC's Complaint. The grounds for this motion are set forth in Defendants' Opening Brief, submitted herewith.

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September 1, 2011

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to:

Steven J. Balick, Esquire
Tiffany Geyer Lydon, Esquire
Andrew C. Mayo, Esquire
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I further certify that I caused copies of the foregoing document to be served on September 1, 2011, upon the following in the manner indicated:

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